

EXHIBIT 103

CONFIDENTIAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE
TRUJILLO, individually and on
behalf of all other similarly
situated,

Plaintiffs,

vs.

No.

5:20-cv-03664-LHK-SVK

GOOGLE LLC,

Defendant.

_____ /

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VIDEOTAPED DEPOSITION OF RAMIN HALAVATI

Remote Zoom Proceedings

Zurich, Switzerland

Tuesday, January 18, 2022

REPORTED BY:

LESLIE ROCKWOOD ROSAS, RPR, CSR 3462

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Job No. 5035959

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1 Do you see that?

2 A. Yes.

3 Q. And when you said "it's quite different from
4 Safari's private mode," you were talking about Chrome's
5 private mode; correct? 10:44:20

6 A. Yes. Chrome's Incognito versus Safari's private
7 mode.

8 Q. And how is Chrome Incognito mode quite different
9 from Safari's mode?

10 A. In Chrome, we consider all tabs in one window in 10:44:33
11 a common session, but in Safari, they consider each tab a
12 separate, isolated session.

13 Q. And does isolation per tab improve tracking
14 protection?

15 MR. ANSORGE: Objection. Vague. 10:44:52

16 THE WITNESS: Yes. It can result in more
17 privacy, but less functionality.

18 Q. BY MR. REBLITZ-RICHARDSON: Does the current

19 implementation of Chrome Incognito mode create an

20 off-the-record profile on top of the existing profile? 10:45:13

21 A. Yes.

22 Q. And has that been the way that Chrome Incognito
23 mode functions going all the way back to when you started
24 in August 2016?

25 A. Yes. 10:45:32

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